

1. ERRATA TO THE FINAL EIR

On September 25, 2018, the Final EIR for the Division 20 Portal Widening and Turnback Facility Project (Proposed Project) was published on the Project’s website and distributed to interested parties. Following the release of the Final EIR, it came to Metro’s attention that Metro had inadvertently omitted from the Final EIR responses to the April 30, 2018 comment letter from Central City Association of Los Angeles (CCA). This errata to the Final EIR updates Chapter 3.0, Responses to Comments, provides Metro’s responses to CCA’s April 30, 2018 letter, and updates Final EIR Table 3.1, List of Comment Letters on the Draft EIR. This comment letter has been assigned as Comment Letter 54 as a comment from a Community and Business Interest Group. This errata also updates Table 12 in Appendix A of the Final EIR, Public Engagement Summary Report, to reflect an additional written public comment. No new significant information requiring recirculation of the EIR is provided in this errata to the Final EIR.

Table 3.1 List of Comment Letters on the Draft EIR

Letter No.	Commenter	Date
Public Agencies and Elected Offices		
1.	California Department of Transportation	April 30, 2018
2.	California High-Speed Rail Authority	April 30, 2018
3.	City of Los Angeles, Councilmember, 14 th District	April 30, 2018
4.	South Coast Air Quality Management District	April 24, 2018
5.	State Clearinghouse and Planning Unit, Governor’s Office of Planning and Research	May 1, 2018
Community and Business Interest Groups		
6.	Arts District Community Council LA	April 12, 2018
7.	Historic Cultural Neighborhood Council	April 12, 2018
8.	Little Tokyo Service Center	April 30, 2018
9.	Los Angeles Conservancy	April 30, 2018
10.	Los Angeles Downtown Arts District Space	April 23, 2018
11.	Los Angeles Downtown Arts District Space	April 23, 2018
12.	Los Angeles Downtown Arts District Space	April 27, 2018
13.	Los Angeles Downtown Arts District Space	April 28, 2018
14.	Los Angeles River Artists & Business Association	April 12, 2018
15.	Santa Fe Arts Colony Tenants Association	April 30, 2018
54.	Central City Association of Los Angeles	April 30, 2018
Individuals		
16.	Alek Friedman	April 18, 2018
17.	Alexander Friedman	March 16, 2018
18.	Amy Ludwig	April 29, 2018
19.	Andrea Uyeda	April 29, 2018
20.	Ann Wallace	April 28, 2018
21.	Athena Aramovich	April 28, 2018

Letter No.	Commenter	Date
22.	Beverly Denenberg	April 28, 2018
23.	Carlton Davis	April 26, 2018
24.	Christopher Smith	April 23, 2018
25.	Debbie Gaughan	April 27, 2018
26.	Deborah Meadows	April 30, 2018
27.	Douglas Geller	April 17, 2018
28.	Evelyn Gray	April 28, 2018
29.	Frank Mastroly	April 23, 2018
30.	James McMath	April 30, 2018
31.	Jason Foo	April 30, 2018
32.	Jay Falconer	April 27, 2018
33.	Jonathan Jerald	April 28, 2018
34.	Jonathan Jerald	April 30, 2018
35.	Judith Randall	April 27, 2018
36.	Kathie Cain	April 28, 2018
37.	Kathleen Bergstorm	April 27, 2018
38.	Keith Nakata	April 30, 2018
39.	Laura Ferguson	April 30, 2018
40.	Lisa Angstreich	April 27, 2018
41.	Mary Alice Wollam	April 27, 2018
42.	Nancy Uyemura	April 28, 2018
43.	Richard Schave	April 25, 2018
44.	Sabrina Nucciarone	April 27, 2018
45.	Sheri A. Saperstein	April 27, 2018
46.	Tara Devine	April 27, 2018
47.	Terrance Ross	March 25, 2018
48.	Terrance Ross	March 25, 2018
49.	Valerie Mitchell	April 27, 2018
Public Hearing Speaker Comments		
50.	Hillary Norton	April 12, 2018
51.	Craig Thompson	April 12, 2018
52.	Jerard Wright	April 12, 2018
53.	Former Councilman Tom LaBonge	April 12, 2018

COMMENT LETTER NO. 54



April 30, 2018

Cris B. Liban
Executive Officer, Environmental Compliance and Sustainability
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-16-9
Los Angeles, CA 90012

Re: Draft EIR: Division 20 Portal Widening and Turnback Facility Project

Dear Mr. Liban,

Established in 1924, Central City Association (CCA) is committed to advancing policies that enhance Downtown Los Angeles' vibrancy and increase investment in the region. CCA represents more than 400 businesses, trade associations, and nonprofit organizations, and our members depend on a robust and reliable transportation network to effectively serve Downtown residents, workers, and visitors.

54-1

We believe that the Division 20 Portal Widening and Turnback Facility Project can significantly improve the transit experience and reduce environmental impact. However, we believe that certain aspects of the project have not been adequately explored and, left unstudied, this will lead to a project that produces less ridership, impacts the environment more significantly, and fails to adequately meet project objectives and community goals.

54-2

We raised these concerns during the scoping period for this project, but unfortunately they do not appear to have been addressed in the draft Environmental Impact Report. We hope that Metro can address these issues while they are still unlikely to create significant delay or require major project redesign. A copy of our scoping period letter has been attached for reference.

54-3

Arts District Red Line Station Planning Must Be Included

In our previous letter we expressed concern that the future Arts District Red Line station at 6th Street was not included in the scope of this project, which we believe is a major oversight.

54-4

If planning for a future station is not included at this stage in the Division 20 project, it is very likely that the 6th Street Station will result in increased cost and environmental impacts associated with redesign and re-engineering of the Division 20 railyard. A separate design and construction phase is also more likely to impact operations of the upgraded Division 20 railyard and turnback facility. As a result, this project would be unable to deliver the full environmental and operational benefit promised by the draft EIR, and would thereby fall short on Project Objectives #1 (providing core capacity improvements for

increased Red/Purple Line service) and #2 (providing new tracks and switches to provide faster train service at Union Station).

We also believe this project fails to fully explore a reasonable range of alternatives by omitting an Arts District rail station. Inclusion of an Arts District Station — or at least planning to accommodate one in the future, with minimal disruption — will lead to greater greenhouse gas reductions through reduced single-occupancy vehicle travel by Arts District residents and workers, and improved service for Red and Purple Lines through Union Station by reducing/eliminating future redesign and reconstruction impacts. It would appear that a project alternative that explicitly plans for an Arts District Station at 6th Street is environmentally superior to any of the proposed alternatives found in the draft EIR.

54-4
(cont.)

A better approach is to plan for the 6th Street Station today, ensuring that the Division 20 facilities are designed to accommodate future construction at the least cost and operational/environmental impact.

Expansion of Railyard Requires Study of Additional Mitigation Alternatives

CCA’s scoping letter also discussed our concerns with the nature of Metro’s storage and turnback tracks: how they currently exist as an open-air facility — creating a harsh and uninviting barrier between the Arts District and the LA River — and how the Division 20 project maintains and even expands this environment.

As with the Arts District Red Line Station, we believe that Metro has failed to explore a reasonable range of alternatives by not evaluating a project alternative that includes “decking” of the existing and future railyard. Decking of the railyard, as has been done in other Downtowns across the U.S. and around the world, will allow for more residents and businesses to locate proximate to rail transit, additional opportunities for parks and open space. In turn, decking would result in reduced impacts relating to GHG emissions, energy resources, cultural resources, aesthetics, and air quality.

While decking may not have been an obligation for preservation of existing facilities, we believe the expansion of the Division 20 railyard contemplated in the draft EIR requires the study of this option. Metro must study how its expanding facilities impact the Downtown community, and how alternatives that include decking (or similar approaches) can help mitigate some of those impacts. Now is the time to evaluate these options, because future redesigns and reconstruction will have greater impacts on train service as well as surrounding neighbors and businesses, and will compromise Metro’s ability to meet Project Objectives in the long run.

54-5

This should be interpreted as an opportunity to explore how Metro can reduce its impact while also generating additional revenues. The Division 20 land is extremely valuable and will be vastly underutilized if it remains limited to railyard use only. A study of how decking can be accommodated concurrent with facility expansion, or how Division 20 work can be designed to best accommodate decking in the future, will help Metro capitalize on this opportunity while also minimizing impacts caused by the preservation and expansion of its open-air railyard.

Conclusion

CCA believes that these recommendations better capture the true range of alternatives available to Metro and are the most effective way to reduce the environmental impacts contemplated in your analysis. We also believe they are essential to delivering the world-class facilities that Los Angeles deserves, and that they appropriately recognize the unprecedented investment occurring in and along the LA River. We hope that you will be able to incorporate these concerns into your updated environmental impact report and we look forward to working with Metro to advance this important regional project.

54-6

Sincerely,



Jessica Lall
President & CEO, Central City Association of Los Angeles

LETTER NO. 54 RESPONSE

Jessica Lall
President & CEO
Central City Association of Los Angeles (CCA)
jlall@ccala.org

- 54-1 This comment provides a summary of CCA purpose, function, and members. The comment does not directly assess the adequacy of the Draft EIR or raise significant environmental issues, and no further response is necessary.
- 54-2 This comment states that CCA believes that the Proposed Project has the potential to significantly improve the transit experience and reduce environmental impact. However, it also states that the Draft EIR did not adequately explore certain aspects of the Proposed Project that would improve ridership, reduce environmental impacts, and allow the Proposed Project to adequately meet project objectives and community goals. These concerns are addressed in the detailed responses to comments provided below.
- 54-3 This comment states that the Draft EIR failed to address these issues despite CCA having raised them during the scoping period and indicates CCA's desire for Metro to address the issues while it would still be feasible to do so. Metro received the letter that was submitted during the scoping period. The letter is included on page 355 of the Scoping Summary Report, which is Appendix A of the Draft EIR. Metro reviewed all comments received during the scoping period, including the CCA letter. For reasons further explained in detailed responses below, Metro did not add the Arts District/6th Street Station or decking to the Project Description and decking the Rail Yard was not determined to be an alternative that would avoid or substantially lessen any of the significant effects of the Proposed Project. See also Response to Comment 54-5, below.
- 54-4 This comment states that CCA provided a letter during the scoping period expressing concern that the Proposed Project does not include an Arts District/6th Street Station. A new rail station and associated trackwork are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster service times at Union Station. However, important to the CCA comment on the Proposed Project definition, Metro designed the Project Site such that a future Arts District Station could be implemented with minimal disruption to the Rail Yard. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or

early 2019. For additional information, please refer to Responses to Comments **3-5** and **3-9** on pages 3-15 and 3-16 of the Final EIR for the Proposed Project.

The comment also states that CCA believes that the Draft EIR failed to explore a reasonable range of alternatives by omitting an Arts District rail station, which CCA claims would reduce environmental impacts. CCA's characterization of an Arts District Station as an alternative that would reduce or eliminate impacts identified in the Draft EIR is inaccurate. CEQA requires an analysis of alternatives to the Proposed Project to reduce or eliminate significant impacts associated with project development. Section 15126.6(a) of the CEQA Guidelines states:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.

The legal requirements to identify feasible alternatives and mitigation measures are acknowledged in Chapter 1 Introduction and Chapter 6 Alternatives of the Draft EIR. As stated above, a new station is outside the scope of the Proposed Project. Therefore, it is not an alternative to the Proposed Project. Furthermore, it would not reduce the significant historic resource and construction noise and vibration impacts identified in the Draft EIR.

- 54-5 This comment states that during the scoping period, CCA also raised its concern that the Division 20 Rail Yard, being an open-air facility, creates a harsh and uninviting barrier between the Arts District and the LA River, and that the Proposed Project would do nothing to improve it. The comment continues to state that CCA believes that the Draft EIR is inadequate because it fails to explore a reasonable range of alternatives, including one that would deck the Rail Yard, to mitigate significant impacts. The Draft EIR includes mitigation that eliminates potentially significant impacts associated with aesthetics, cultural resources, operational noise and vibration, and tribal cultural resources. The Draft EIR concluded that the Proposed Project would result in significant impacts related to historic resources and construction noise and vibration despite implementation of mitigation. Decking the Rail Yard for land use development would not eliminate either of these significant impacts. Decking the Rail Yard would require depressing existing tracks to meet vertical clearance requirements for safe train operations and relocating existing utilities including the City of Los Angeles 12-foot arch and 42-inch reinforced concrete storm drain. Metro would still need to expand the Rail Yard into the Citizens Warehouse/Lysle Storage Company property to accommodate new storage tracks. Construction activities would occur within the same proximity to One Santa Fe as assessed for the Proposed Project thereby resulting in construction noise and vibration impacts, which would not be a reduction or

elimination of impacts when compared to the Proposed Project. In fact, it is likely that decking the Rail Yard would exacerbate these impacts or create new impacts instead of eliminating or reducing impacts in the Draft EIR. For example, decking would require physical depression of the tracks, which would greatly increase the length and intensity of construction, resulting in more severe noise and vibration impacts at One Santa Fe. Other possible impacts include traffic congestion and pollution associated with substantially more construction trucks on the roadway network and growth inducing impacts, including indirect impacts associated with providing additional property for land use development leading to potentially substantial amount of new water consumption.

The comment also notes that the property at which the Division 20 Rail Yard is located is extremely valuable and has potential to be used as more than just a rail yard, and that the environmental impact analysis should consider how decking the rail yard would allow Metro to take advantage of this opportunity while reducing the impacts of an open-air rail yard. As discussed above, decking the Rail Yard would not reduce or eliminate significant impacts identified in the Draft EIR, but would instead likely exacerbate significant impacts identified in the Draft EIR. Decking would not help the Project to achieve the Project Objectives and would substantially add to the project cost and schedule.

- 54-6 This comment indicates that the recommendations made in its comment letter are more representative of the true range of alternatives available to Metro and are the most effective way to reduce environmental impacts considered in the Draft EIR. The comment also requests incorporating CAA comments on the Proposed Project definition into the Final EIR and an interest in working with Metro to advance the Proposed Project. The comment does not directly assess the adequacy of the Draft EIR or raise significant environmental issues.